

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

Pursuant to §III.C.4 of the Court’s Practice and Procedure Manual and Administrative Order No. 209, ¶4, Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Plaintiff”), respectfully moves this Court to hold telephonic or video oral argument on Plaintiff’s Motion to Compel Production of Improperly Withheld Documents ECF No. 195 (“Motion”).

Plaintiff submits that oral argument would be beneficial because Plaintiff’s Motion and Defendants’ defenses thereto concern thousands of documents and nearly a dozen privilege logs produced and withheld over years of discovery. Plaintiff understands that the exigent circumstances created by COVID-19 have significantly impacted Court proceedings and respectfully seeks oral argument only at a time and in such a manner as is convenient for the Court.

On March 24, 2020, counsel for the parties conferred concerning holding a telephone or video conference, and the motion for oral argument is unopposed.

DATED: March 26, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 26, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

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